## **BAKER & HOSTETLER LLP**

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Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

KOREA EXCHANGE BANK, individually and as Trustee for Korea Global All Asset Trust I-1, and as Trustee for Tams Rainbow Trust III, and KOREA INVESTMENT TRUST MANAGEMENT COMPANY,

Defendants.

Presentment Date: February 8, 2017

Presentment Time: 12:00 p.m.

Objections Due: February 8, 2017

Objection Time: 11:30 a.m.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 11-02572 (SMB)

NOTICE OF PRESENTMENT OF THE TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO FED. R. BANKR. P. 8002(d) FOR EXTENSION OF TIME TO FILE NOTICE OF APPEAL PLEASE TAKE NOTICE that Irving H. Picard (the "Trustee"), as trustee for the substantively consolidated estate of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff, will present a motion under Federal Rule of Bankruptcy Procedure 8002(d) for an extension of time to file a notice of appeal in the above-captioned adversary proceeding (the "Motion"), annexed hereto as Exhibit A, and the proposed order granting the relief sought therein (the "Proposed Order"), annexed hereto as Exhibit B, to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York for approval and signature on February 8, 2017 at 12:00 p.m.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the Southern District of New York; (iii) specify the name of the objecting party and state with specificity the basis of the objection(s) and the specific grounds therefor; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with proof of service and a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein, One Bowling Green, New York, New York 10004; and (v) be served upon each of the following: (a) counsel to the Trustee, Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111, Attn: Torello H. Calvani, Esq.; (b) counsel to Korea Exchange Bank, King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036-4003, Attn: Richard A. Cirillo; (c) counsel to Korea Investment Trust Management Company, Wollmuth Maher & Deutsch LLP, One Gateway Center, Ninth Floor, Newark, New Jersey 07102, Attn: James N. Lawlor; and (d) counsel to the Securities Investor Protection Corporation, 1667 K Street, N.W.,

Suite 1000, Washington, D.C. 20006, Attn: Kevin H. Bell, Esq., so as to be received no later than 11:30 a.m. on February 8, 2017.

PLEASE TAKE FURTHER NOTICE that unless written objection to the Motion, with proof of service as set forth above, is filed with the Clerk of the Court by 11:30 a.m. on February 8, 2017, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will hear the Motion, along with any written objection timely received, on a date to be determined at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408 before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: February 6, 2017 New York, New York By: /s/ <u>David J. Sheehan</u> BAKER & HOSTETLER LLP

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